

ATTACHMENT B

LIST OF LOCAL EXCHANGE CARRIERS INTENDING TO USE LIDB FOR TRANSMITTING PAYPHONE CODING DIGITS

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Beaver Creek Cooperative Telephone Company

Beaver Creek Cooperative Telephone Company, ("Beaver Creek"), serves rural customers in Oregon. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 4,400 access lines of which 11 are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

An SS7 based solution is currently available through the LIDB provider. Implementing a LIDB solution would enable the company to transmit the appropriate payphone coding digits by March 9, 1998. To provide Flex ANI would require a generic software upgrade with an estimated cost of \$4,800. The Flex ANI feature would not be operational until first quarter 1999.

Imposing a software upgrade specifically for transmitting payphone digits does not serve in the public interest, especially when an alternate means is available and accomplishes the same goal. While we believe that the record in this proceeding to date would indicate our compliance, this waiver is being requested in the event that the FCC mandates Flex ANI as the only option.

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Clear Creek Mutual Telephone Company

Clear Creek Mutual Telephone Company, ("Clear Creek"), serves rural customers Oregon. The company will not meet the March 9, 1998, deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 3,500 access lines in service, of which seven (7) are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

An SS7 solution is currently available through the LIDB provider. Implementing a LIDB solution would enable the company to transmit the appropriate payphone coding digits by March 9, 1998. To provide FLEX ANI would require a generic software upgrade with an estimated cost of \$4,180. The FLEX ANI feature would not be operational until first quarter of 1999.

Imposing a software upgrade specifically for transmitting payphone digits does not serve in the public interest. While we believe that the record in this proceeding to date would indicate our compliance, this waiver is being requested in the event that the FCC mandates FLEX ANI as the only option.

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Copper Valley Telephone Cooperative

Copper Valley Telephone Cooperative, ("Copper Valley"), serves approximately 5,358 rural customers in Valdez and Copper Basin, Alaska. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP.

Copper Valley has two switches serving 45 access lines, of which there are only 6 payphone lines (less than 1% of the total access lines) that are unable to provide FLEX ANI. Based on information from the switch manufacturer, Copper Valley will be unable to provide the FLEX ANI capability. An SS7 based solution is available through the LIDB provider. Implementing a LIDB solution will enable the company to transmit the appropriate payphone coding digits by March 9, 1998. Based on the aforementioned, Copper Valley believes the LIDB solution, for only six (6) payphone lines, would better serve the public interest.

Imposing a software upgrade specifically for transmitting payphone digits does not serve in the public interest, especially in this remote area, when an alternate means is available and accomplishes the same goal. While we believe that the record in this proceeding to date would indicate our compliance, this waiver is being requested in the event that the FCC mandates FLEX ANI as the only option.

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Lake Livingston Telephone Company

Lake Livingston Telephone Company, ("Lake Livingston"), serves rural customers in Texas. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 1,100 access lines, of which one (1) is a payphone line that will not be capable of transmitting FLEX ANI by March 9, 1998.

Lake Livingston intends using its LIDB provider to transmit payphone coding digits. Implementing a LIDB solution would enable the company to transmit the appropriate payphone coding digits by March 9, 1998.

Imposing a software upgrade specifically for transmitting payphone digits does not serve in the public interest, when an alternate means is available and accomplishes the same goal. While we believe that the record in this proceeding to date would indicate our compliance, this waiver is being requested in the event that the FCC mandates FLEX ANI as the only option.

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Monitor Cooperative Telephone Company

Monitor Cooperative Telephone Company, ("Monitor"), serves rural customers in Oregon. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 749 access lines, of which one (1) is a payphone line that will not be capable of transmitting FLEX ANI by March 9, 1998.

Monitor intends using its LIDB provider to transmit payphone coding digits. Implementing a LIDB solution would enable the company to transmit the appropriate payphone coding digits by March 9, 1998.

Imposing a software upgrade specifically for transmitting payphone digits does not serve in the public interest, when an alternate means is available and accomplishes the same goal. While we believe that the record in this proceeding to date would indicate our compliance, this waiver is being requested in the event that the FCC mandates FLEX ANI as the only option.

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Steelville Telephone Exchange, Inc.

Steelville Telephone Exchange, Inc., ("Steelville"), serves rural customers in Missouri. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 4,300 access lines, of which 46 are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

Steelville intends using its LIDB provider to transmit payphone coding digits. Implementing a LIDB solution would enable the company to transmit the appropriate payphone coding digits by March 9, 1998. To provide FLEX ANI would require a generic software upgrade at an estimated cost of \$15,000. The FLEX ANI feature would not be operational until August of 1998.

Imposing a software upgrade specifically for transmitting payphone digits does not serve in the public interest, when an alternate means is available and accomplishes the same goal. While we believe that the record in this proceeding to date would indicate our compliance, this waiver is being requested in the event that the FCC mandates FLEX ANI as the only option.

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Tonica Telephone Company

Tonica Telephone Company, ("Tonica"), serves rural customers in Illinois. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 526 access lines, of which 10 are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

Tonica intends using its LIDB provider to transmit payphone coding digits. Implementing a LIDB solution would enable the company to transmit the appropriate payphone coding digits by March 9, 1998.

Imposing a software upgrade specifically for transmitting payphone digits does not serve in the public interest, when an alternate means is available and accomplishes the same goal. While we believe that the record in this proceeding to date would indicate our compliance, this waiver is being requested in the event that the FCC mandates FLEX ANI as the only option.

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Union Telephone Company

Union Telephone Company, Inc., ("Union"), serves rural customers in Colorado, Wyoming and Utah. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 7,000 access lines, of which 141 are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

Union intends using its LIDB provider to transmit payphone coding digits. Implementing a LIDB solution would enable the company to transmit the appropriate payphone coding digits by March 9, 1998. To provide FLEX ANI would require a software patch. Union has initiated dialogue with the vendor to determine the cost for the software patch. Preliminary costs for the software patch are \$80,000. Union anticipates installation of the software patch by December 31, 1998.

Imposing a software upgrade specifically for transmitting payphone digits does not serve in the public interest, when an alternate means is available and accomplishes the same goal. While we believe that the record in this proceeding to date would indicate our compliance, this waiver is being requested in the event that the FCC mandates FLEX ANI as the only option.

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Wabash Telephone Cooperative

Wabash Telephone Cooperative, ("Wabash"), rural customers in Illinois. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 4,800 access lines of which 33 are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

An SS7 based solution is currently providing payphone coding digits through its LIDB provider. Imposing a software upgrade specifically for transmitting payphone digits does not serve in the public interest, especially when an alternate means is available and accomplishes the same goal. While we believe that the record in this proceeding to date would indicate our compliance, this waiver is being requested in the event that the FCC mandates Flex ANI as the only option.

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Yukon Telephone Company

Yukon Telephone Company, ("Yukon"), serves rural customers in Alaska. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 450 access lines of which 16 are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

An SS7 based solution is currently providing payphone coding digits through its LIDB provider. Imposing a software upgrade specifically for transmitting payphone digits does not serve in the public interest , especially when an alternate means is available and accomplishes the same goal. While we believe that the record in this proceeding to date would indicate our compliance, this waiver is being requested in the event that the FCC mandates Flex ANI as the only option.

ATTACHMENT C

LIST OF LOCAL EXCHANGE CARRIERS THAT ARE NON-EQUAL ACCESS AND NOT CAPABLE OF FLEX ANI OR LIDB AT THE PRESENT TIME

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Chugwater Telephone Company

Chugwater Telephone Company, ("Chugwater"), serves rural customers in Wyoming. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. Chugwater serves 258 access lines of which seven (7) are payphone lines that will not be capable of transmitting payphone specific coding digits by March 9, 1998.

Chugwater is not capable of FLEX ANI or SS7, and is not equal access. Due to economic constraints, Chugwater has not pursued upgrading its Redcom switch. Imposing a software upgrade or SS7 capability specifically for transmitting payphone digits does not serve in the public interest for non-equal access switches.

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KLM Telephone Company

KLM Telephone Company, ("KLM"), serves rural customers in Missouri. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 1,500 access lines of which 13 are payphone lines that will not be capable of transmitting payphone specific coding digits by March 9, 1998.

KLM is currently using ALCATEL digital E10-FIVE switches to provision service and is not equal access. Within recent years ALCATEL has ceased making upgrades to this switch type. As a result, KLM initiated a modernization plan to replace the switches by second quarter 1999. The modernization plan was recently approved by the Missouri Public Service Commission and KLM is waiting for loan approval to proceed with the procurement and implementation processes. KLM anticipates being operational with the new switch by the end of the second quarter 1999. However, this date could slip based on the delivery date of the switch. KLM will be activate the FLEX ANI feature concurrent with the completion of the switch replacement.

Based on the aforementioned, KLM requests a waiver until third quarter of 1999 to complete its modernization plan and provide payphone coding digits via FLEX ANI.

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RT Communications, Inc.

RT Communications, Inc., ("RT"), serves approximately 15,000 access lines in the South East, North East and North Central parts of Wyoming. At March 9, 1998, only the 150 access lines in the Jefferson City and Gas Hills exchanges will not be capable of FLEX ANI, of which only two (2) are payphone lines. This computes to only 1% of total access lines.

RT has been undergoing a modernization effort over the last three years in an effort to update the current technology, and build efficiencies into the network. Jefferson City and Gas Hills are presently served by Automatic Electric electro-mechanical switches and do not provide equal access. RT is in the process of installing Digital Loop Concentrator (DLC) technology to service these exchanges. Where Worland will serve as the host switch and will provide FLEX ANI and equal access. The implementation plan requires a change in the outside plant and the installation of a new microwave system at an estimated cost of \$450,000. RT anticipates the implementation plan to be complete by third quarter 1999.

Based on the aforementioned, RT requests a waiver until third quarter 1999, to complete its switch replacements and provide payphone coding digits via FLEX ANI.